REMARKS

Reconsideration of the present application, as amended, is respectfully requested. Claims 1, 33, 38, 40, and 44 have been amended. No claims have been added or cancelled.

Examiner rejected claims 1-8, 10-15, 18-23, 25, 27-29, 33-40, 42-46, and 48-50 under 35 U.S.C. §102(e) as being anticipated by U.S. Patent Number 6,182,127 to Cronin

Cronin discusses displaying an image, and eliminating performance problems for large images by tiling the image, i.e. separating it into tiles. (Cronin, Abstract). This is fundamentally different from claim 1, in that Cronin's images are <u>not independent</u>, but rather part and portion of a single image which is separated into tiles. This is further explained in Cronin, at column 3, lines 62-66, where Cronin specifically notes that the "generation of the view tiles 160 is handled by an image tiling routine which divides a given page, rendered as an image, into a grid of smaller images (FIG. 3A) called view tiles is A1, A2, B1, etc. Thus, it is clear that in Cronin the "images" being displayed by the system are <u>not independent images</u>, but rather components of the same image that were separated into tiles.

Claim 1, as amended, on the other hand, recites:

An apparatus, comprising:

a multiple-image viewer to concurrently display multiple independent images within a single window in a network system, the viewer enabling manipulation of each of the multiple independent images, at least one of the multiple independent images displayed being a raster graphics file, each of the multiple independent displayed images having a separate and independent data file.

(Claim 1, as amended) (emphasis added). As noted above, Cronin does not teach or suggest <u>independent images</u> with <u>separate and independent data files</u>.

Rather, the images are part and parcel of a larger image, but separated into tiles, and the data files are representative of the relative positions of the images within the tiling. Therefore, claim 1, and claims 2-32 which depend on it, are not anticipated by Cronin.

Claim 33, as amended, recites:

A computer system, comprising:

a client having a memory;

a computer program to manipulate and to display multiple independent images within a single window, the program executable by the client, one or more of the <u>multiple independent</u> images being a raster graphics file, <u>each of the multiple independent displayed images having a separate and independent data file;</u>

a network connection; and an image database associated with a server.

(Claim 33, as amended) (emphasis added). As noted above, Cronin does not teach or suggest <u>independent images</u> with <u>separate and independent data files</u>.

Rather, the images are part and parcel of a larger image, but separated into tiles, and the data files are representative of the relative positions of the images within the tiling. Therefore, claim 33, and claims 34-37 which depend on it, are not anticipated by Cronin.

Claim 38, as amended, recites:

A method, comprising:

creating a window, the window being defined by a page description language;

displaying multiple independent raster graphic images in the window, each of the multiple independent raster graphic images having a separate and independent data file; and

enabling manipulation of one or more of the multiple raster graphic images displayed in the window.

(Claim 38, as amended) (emphasis added). As noted above, Cronin does not teach or suggest <u>independent images</u> with <u>separate and independent data files</u>.

Rather, the images are part and parcel of a larger image, but separated into tiles, and the data files are representative of the relative positions of the images within the tiling. Therefore, claim 38, and claims 38-43 which depend on it, are not anticipated by Cronin.

Claim 44, as amended, recites:

A computer system, comprising:

a client having a memory;

a computer program to manipulate and to display multiple independent images within a single window, the program executable by the client, one or more of the <u>multiple independent</u> images being a raster graphics file, <u>each of the multiple independent displayed images having a separate and independent data file;</u>

a network connection; and an image database associated with a server.

(Claim 44, as amended) (emphasis added). As noted above, Cronin does not teach or suggest <u>independent images</u> with <u>separate and independent data files</u>.

Rather, the images are part and parcel of a larger image, but separated into tiles, and the data files are representative of the relative positions of the images within the tiling. Therefore, claim 44, and claims 45-50 which depend on it, are not anticipated by Cronin.

Examiner further rejected claims 9, 16, 24, 26, and 30-32 under 35 U.S.C. §103(a) as being unpatentable over Cronin in view of U.S. Patent No. 5,973,692 to Knowlton. Claims 9, 16, 24, 26, and 30-32 depend on claim 1, and incorporate its limitations.

Knowlton discusses the use of visual links to identify addresses of locations in remote systems. However, Knowlton does not discuss the concept of a multi-image viewer. Therefore, Knowlton does not overcome the shortcomings of Cronin, discussed above. Therefore, claims 9, 16, 24, 26, and 30-32 are not obvious over Cronin in view of Knowlton.

Examiner further rejected claims 17, 41, and 47 under 35 U.S.C. §103(a) as being unpatentable over Cronin in view of U.S. Patent No. 5,909,518 to Chiu. Claim 17 depends on claim 1, and incorporates its limitations. Claim 41 depends on claim 38 and incorporates its limitations. Claim 47 depends on claim 44, and incorporates its limitations. Chiu discusses wavelet and inverse wavelet-like transformations. However, Chiu does not teach or suggest a multi-image viewer, which is capable of viewing multiple independent images. Therefore, Chiu does not overcome the shortcomings of Cronin discussed above, and claims 17 and 41 & 47 are not obvious over Cronin in view of Chiu.

Applicant respectfully submits that in view of the amendments and discussion set forth herein, the applicable rejections have been overcome. Accordingly, the present and amended claims should be found to be in condition for allowance.

If a telephone interview would expedite the prosecution of this application, the Examiner is invited to contact Judith Szepesi at (408) 720-8300.

If there are any additional charges/credits, please charge/credit our deposit account no. 02-2666.

Respectfully submitted,

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